EXHIBIT C

CHOATE

CHOATE HALL & STEWART LLP

Sophie F. Wang
t 617-248-4052
f 617-502-4052
swang@choate.com

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VIA EMAIL

Aaron M. Nathan, Azra Hadzimehmedovic
Jae Yong Shin, Lital Leichtag-Fuks
Matthew D. Powers, Natasha M. Saputo
Paul T. Ehrlich, Robert L. Gerrity
Sergio Davila, William P. Nelson
Yi Chen
TENSEGRITY LAW GROUP LLP
555 Twin Dolphin Drive, Suite 650
Redwood Shores, CA 94065
aaron.nathan@tensegritylawgroup.com
azra@tensegritylawgroup.com
jae.shin@tensegritylawgroup.com
lital@tensegritylawgroup.com
matthew.powers@tensegritylawgroup.com
natasha.saputo@tensegritylawgroup.com
paul.ehrlich@tensegritylawgroup.com
robert.gerrity@tensegritylawgroup.com
sergio.davila@tensegritylawgroup.com
william.nelson@tensegritylawgroup.com
yi.chen@tensegritylawgroup.com

Re: *Limelight Networks, Inc. v. Akamai Technologies, Inc. and XO Communications, LLC.,*
      Case No. 3:15cv720-JAG - Deficient Document Production

Dear Will:

I write to identify the most significant and serious deficiencies in Limelight's production of
technical documents to date, and in particular concerning the insufficiency of Limelight's
production of documents in allowing Akamai to revise its infringement contentions, as required
by the Court.

June 17, 2016
Page 2

As you are aware, you represented to the Court and to counsel for Akamai on June 2, 2016, that Limelight would be making an additional production of core technical documentation on June 9, 2016. Your contention now that by "production of technical documentation," you meant "make source code available for inspection" is disingenuous. Nonetheless, there is no dispute that Limelight did not make any document production on June 9, technical or otherwise.

I understand that you now have taken the position that Limelight has previously produced its core technical documentation on May 31, 2016, of documents from Limelight's "central repository of technical information, known as Confluence." Your colleagues have further stated that Limelight has produced "the entirety of its Confluence technical document repository." However, it is apparent from our review of Limelight's production -- and from your own admission -- that this statement is false.

Notably, based on our review of the 1576 documents you have identified as your core technical documents, there is a significant dearth or complete absence of technical documents on the topics listed below. Further, in many cases where Limelight has made a narrow production, the documents Limelight has produced highlight Limelight's apparent decision to withhold substantial and highly relevant documentation of the structure, function, design, and operation of the accused products.

General Categories of Documents

Below is a list of general categories of the types of documents that have not been produced:

- All past and present user guides or instruction manuals for each of the accused features of Limelight's content delivery services, including content delivery, content performance, content storage, and content security. *See, e.g.* LLNW_001655450 (a 2012 version of the Agile Storage User Guide); LLNW_00043022 (a 2014 version of the Orchestrate Performance End-to-End Guide). *See* Akamai's Requests for Production Nos. 66, 80.

- Software Requirements Specifications (as defined in LLNW_0042109). *See* Akamai's Request for Production No. 29.

- Configuration files for Limelight servers, including databases used in configuring Limelight servers, *e.g.*, MySQL databases. *See* Akamai's Requests for Production Nos. 85, 86, 104, 105.

- Technical documents sufficient to describe the design, development, structure and operation of Limelight's content delivery services, including content delivery, content performance, content storage, and content security. *See* Akamai's Requests for Production Nos. 29, 30, 78, 79, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 103, 104, 105, 109.

- Technical documents sufficient to describe the design, development, structure and operation of Limelight's "Orchestrate Control" feature or "Control Management Portal"

June 17, 2016
Page 3

feature of the Limelight Orchestrate™ Platform, including but not limited to Limelight's Self Service Portal, "Control 3". *See* Akamai's Requests for Production Nos. 29, 88, 107.

- Technical documents sufficient to describe the design, development, structure and operation of Limelight's "Configuration Manager" feature. *See* Akamai's Requests for Production Nos. 29, 89, 107.

Failure to Produce Core Technical Documents Regarding Communication Protocols and/or High-Performance Communication Protocols and/or Optimizations

As described in LLNW_00043022 and in publicly available documents, Limelight's content delivery system uses a number of "middle-mile optimizations" including, but not limited to, connection pooling and WAN and TCP optimizations. Limelight has not produced any technical documents concerning the particular optimizations it provides, or implementation details for the communication protocols and/or high-performance communication protocols used by Limelight. Limelight has similarly produced no documents concerning the communication, network, or transfer protocols used between its own servers, edge or storage or otherwise, residing within the Limelight private network.

You stated on June 14, 2016, that you have now identified a category of additional documents that may be relevant to the subject matter of the '133 patent, *e.g.*, concerning the communication protocols and optimizations used by Limelight's system, that you will produce "shortly." Your identification of this category of missing, critical documents, only after Akamai informed you of the deficiency, does not support your contention that you have produced "the entirety of its Confluence technical document repository."

To date, we have not received any such production. Per your June 14 email, once we receive Limelight's production, we will supplement our contentions regarding the '133 patent, with the agreement that Limelight will neither oppose supplementation taking place within 8 days of that production, nor seek to strike the '133 patent contentions during the intervening period.

Failure to Produce Core Technical Documents Regarding DNS Functionality

In addition, Limelight has failed to produce core technical documents sufficient to describe the functionality of its Domain Name Servers -- including without limitation the mechanisms utilized by Limelight's Domain Name Servers and related software to select what IP addresses will be returned for the resolution of LL CDN hostnames. For example, Limelight has apparently failed to produce documents describing the functioning of the mechanisms used to build, update and otherwise populate the DNS Zone tables in its DNS servers. Specifically, there appear to be no documents in the production that describe how the following software works to build the DNS Zone tables:

- GEO
- healthd
- named

June 17, 2016
Page 4

- geod
- geo health check
- Power DNS
- geo history
- geo conf
- geo exporter
- show health
- groomer

All of the above clearly play some important role in the population of the zone tables used by Limelight's DNS servers, yet no documents have been produced.

Further, Limelight has apparently failed to produce documents sufficient to describe:

- The functioning of the load balancers that are apparently utilized in at least some of its DNS deployments. *See, e.g.*, LLNW_00166161 at slide 14.

- The functioning of the bgpd.

- Documents sufficient to identify what Limelight deployments utilize the various Anycasted DNS described in Limelight's documents as deployed for the A1, A2, A3, and A4 "platforms." *See, e.g.*, LLNW_00166161 at slides 11-17.

- Deployment and configuration of all servers, including edge servers, DNS nameservers, and other content servers within all POPs or any other locations.

- Limelight's conventions, operations and procedures regarding the development and assignment of hostnames and domain names utilized by its DNS servers -- including but not limited to the conventions, operations, and procedures used to determine how those hostnames or domain names are generated and mapped to particular customers or customer content. All of the above are directly related to the operation of Limelight's DNS servers.

- Deployment and configuration of all servers, including edge servers, DNS nameservers, and other content servers within all POPs or any other locations.

Limelight's failure to meet its commitment has prejudiced Akamai at least with respect to Akamai's ability to supplement its infringement contentions as ordered by the Court. Limelight's conduct has also subjected Akamai to unreasonable expense and unfair prejudice in the preparation of its case.

Please confirm that Limelight will fulfill its obligation under the discovery rules to produce immediately responsive documents in Limelight's possession, custody, or control which describe the requirements, operation, and architecture of the accused products and technologies, including

June 17, 2016
Page 5

the topics specifically listed above, and immediately provide a date certain by which Limelight will do so.

Finally, we have determined that Limelight's production appears to contain a highly confidential internal Akamai document describing certain Akamai technology in detail: LLNW_00167856. Please immediately provide us with the specifics as to what Limelight custodian(s) were in possession of that document and exactly how it came to be in their possession.

Sincerely,

Sophie F. Wang

Cc: All counsel of record

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